

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
	:	
vs.	:	Case No. 2:22-CR-19
	:	
JACKSON SAWALL,	:	JUDGE: GRAHAM
Defendant.	:	

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Counsel for Jackson Sawall, now respectfully moves this Court to expand the allowable travel area in which Mr. Sawall can work.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

/s/ Soumyajit Dutta  
Soumyajit Dutta (OH 76762)  
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*Attorney for Defendant  
Jackson Sawall*

**MEMORANDUM IN SUPPORT OF MOTION**

On February 28, 2022, this Court, as a condition of pretrial release, ordered Jackson Sawall to participate in GPS monitoring throughout the duration of the case. The matter is currently set for sentencing on November 4, 2022.

Mr. Sawall has maintained employment (and his education) throughout the duration of this period, working as a crew chief for SERVPRO Restoration Services. As Mr. Sawall's GPS range is limited to the Eastern District of Wisconsin, there have been further work projects available to him in other parts of the state that he has had to decline.

After consulting with and receiving the blessing of his Pretrial Services officer, Robert Herman, Mr. Sawall asks this Court to expand his allowable travel area to extend to the entirety of the state of Wisconsin such that he can work in all parts of the state. It should be emphasized that Mr. Sawall will still remain on constant GPS monitoring, and still have all other requirements of his bond in place.

Jessica Knight of the United States Attorney's Office has been consulted and has no objection to this request.

**CONCLUSION**

Wherefore, Mr. Sawall respectfully requests the Court to modify the conditions of his release as described above.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

/s/ Soumyajit Dutta  
Soumyajit Dutta (OH 76762)  
Assistant Federal Public Defender